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REMARKS

Claims 1-108 are currently pending, and claims 12-95 are presently under consideration. Independent claims 12, 16, 18, 27, 29, 30, 38, 44, 53, 58, 67, 69, 71-74, 81, 86, 88, 92 have been amended herein. A version of all pending claims can be found at pages 2-18. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claims 12-95 Under 35 U.S.C. §102(e)

Claims 12-95 stand rejected under 35 U.S.C. §102(e) as being anticipated by Kravets *et al.* (US 6,363,377 B1). Withdrawal of this rejection is respectfully requested for at least the following reasons. Kravets *et al.* neither discloses nor suggests each and every feature of applicant's invention as recited in the subject claims.

For a prior art reference to anticipate, 35 U.S.C. § 102 requires that "each and every element as set forth in the claim is found, either expressly or inherently, described, in a single prior art reference." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (quoting *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

Independent claims 12, 18, 27, 29, 30, 38, 44, 53, 58, 67, 71-74, 81, 86, 88, 92 relate to an invention that enhances query results in connection with a search, and such claims recite enhancing the query results "*based at least in part upon a user model*" and/or "*based at least in part upon the enhanced query*" and/or "*such thumbnail based at least in part upon a user model*" and/or "*such summary portions based at least in part upon a user model*" and/or "*upon a user model*." The subject invention *creates a model of a user's information*

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More particularly, by enhancing query results based upon a user model, the claimed invention provides for specifically tailoring and/or configuring the query results to the user. Kravets does not teach or suggest enhancing the query results based upon *a user model*. Rather, Kravets discloses a method of enhancing query results utilizing a clustering technique such as hashing. (See col. 4, lines 50-57). Kravets is simply a tool for enhancing query results using a clustering technique based upon search terms. (See Abstract, lines 3-9). Kravets does not teach or suggest query enhancing *based at least in part upon a user model* as in the subject claimed invention.

Via employment of a user model in applicants' invention, two unique users can search on identical criteria, but receive different query results because each user's model will enhance query results so that the results per user are tailored to their respective needs. In contrast, the system of Kravets would generate same query results to two different users employing identical search terms at the same time because query results are not enhanced based upon characteristics unique to each user (as expressed for example *via* a user model in applicants' invention). Kravets does not teach or suggest employment of a user model representation to allow for personalization of query results as in applicants' invention.

In addition, regarding ranking of query results, Kravets ranks documents returned by a search engine, and such rankings are based upon the aforementioned clustering techniques. The clustering techniques focus upon key words and/or search terms used for the query as compared to employment of a user model as in the subject claimed invention. Within Kravets, "the set of keywords from the search query are used to rank the documents returned by the search engine." (See col. 7, lines 38-40). On the other hand, applicants' claimed invention creates a model of the user's information need independent of a manner in which the information need is expressed (*e.g.*, search terms). The subject invention re-ranks query results *based at least upon a user model* - such user model can be created by monitoring user

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independent of the search engine and based upon the context.” Kravets does not teach or suggest such claimed features of applicants’ invention. Although, Kravets allows a user to receive query results and approve or disapprove of each clustered search, the user manually submitting a “vote” is not a computer implemented method that *creates a context based on a computer user’s interest* let alone *generating information regarding relevancy of query results... based upon the context* as in the subject claimed invention. Rather, Kravets merely discloses and teaches a voting system, allowing the user to manually filter wanted and/or unwanted clusters of information.

In view of the foregoing, it is readily apparent that Kravets neither anticipates nor makes obvious the subject invention as recited in independent claims 12, 16, 18, 27, 29, 30, 38, 44, 53, 58, 67, 69, 71-74, 81, 86, 88, 92 (and claims 13-15, 17, 19-26, 28, 31-37, 39-43, 45-52, 54-57, 59-66, 68, 70, 75-80, 82-85, 87, 89-91, and 93-95 which respectively depend there from). This rejection should be withdrawn.

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II. Conclusion

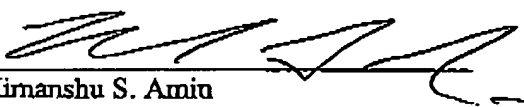
The present application is believed to be condition for allowance in view of the above amendments and comments. A prompt action to such end is earnestly solicited.

In the event any other fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

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